



## REMARKS

### Rejections

#### *Rejections under 35 U.S.C. § 101*

Claims 1-11 stand rejected under 35 U.S.C. § 101 as not directed toward patentable subject matter. Applicant has amended independent claims 1, 4 and 7 to specify that the methods are computerized. Accordingly, Applicant respectfully requests the withdrawal of the rejection of claims 1-11 under 35 U.S.C. § 101.

#### *Rejections under 35 U.S.C. § 112*

Claims 1-22 stand rejected under 35 U.S.C. § 112, second paragraph as indefinite. The Examiner stated that the functions specified in the preambles were not performed by the elements of the claim. Applicant has amended the independent claims to remove the functional language from the preambles and to clarify the functions performed by the claimed elements. Accordingly, Applicant respectfully requests the withdrawal of the rejection of claims 1-22 under 35 U.S.C. § 112.

#### *Rejections under 35 U.S.C. § 103*

#### Claims 7-11 and 18-22

Claims 7-11 and 18-22 stand rejected under 35 U.S.C. § 103(a) as being anticipated by U.S. Patent 5,652,880 to Seagraves in combination with U.S. Patent 5,852,819 to Beller. Applicant respectfully submits that the combination does not disclose each and every element of the invention as claimed in claims 7-11 and 18-22.

Seagraves discloses using codified linkages between related objects in a database for querying and presenting such objects, their linkages and data concerning the linkages. The object data and linkages are grouped together in an outline format so the querying is referred to as "Query-By-Outline." The object data is textual in nature.

Beller discloses determining data patterns by analyzing data from various types of databases. The patterns are presented to user through statistical or graphical representations. Beller also states that visual or audible signals, such a series of words, can be used to describe the meaning of an entity, such a piece of data. Thus, the

audiovisual signals in Beller serve as a semantic description of an entity, which is the opposite of Applicant's claimed entity that describes part of a semantic description.

Furthermore, neither Seagraves nor Beller disclose creating an abstract of a semantic description by linking entities within the semantic description with properties in a concept as claimed. Indeed, neither reference discloses semantic descriptions as defined in the art and in Applicant's specification. Thus the combination cannot be properly interpreted as teaching or suggesting Applicant's claimed semantic descriptions.

In addition, Appellant respectfully submits that the combination of Seagraves and Beller is improperly motivated. The Examiner stated the motivation is to give Seagraves the ability to describe concepts and non-relational parts of a semantic description of audiovisual information. However, because neither Seagraves nor Beller disclose semantic descriptions as defined in the art, there is no teaching in either reference to support the Examiner's rationale.

Accordingly, Applicant respectfully submits that the invention claimed in claims 7-11 and 18-22 is not anticipated by Seagraves and Beller under 35 U.S.C. § 103(a), and respectfully requests the withdrawal of the rejection of the claims.

#### **Allowable Subject Matter**

Applicant thanks the Examiner for indicating that claims 1-10 and 12-17 would be allowable if amended to overcome the § 112 rejection and to incorporate any intervening subject matter. Because Applicant believes all the claims are allowable, Applicant respectfully declines the Examiner's suggestion

#### **SUMMARY**

Claims 1-22 are currently pending. In view of the foregoing amendments and remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Sue Holloway at (408) 720-3476.



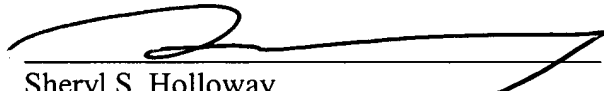
**Deposit Account Authorization**

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR  
& ZAFMAN LLP

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